

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,) CASE NO. 8:15CR140
)
Plaintiff,)
) MOTION TO
vs.) SUPPRESS EVIDENCE
)
ALONDRA M. REBOLLEDO,)
)
Defendant.)

COMES NOW the Defendant by and through her attorney and moves the Court as follows:

1. To suppress evidence seized from an Amtrak train compartment by law enforcement officers on January 23, 2015, in Omaha, Nebraska, for the reason that the search was conducted without warrant, was the product of an unlawful investigatory detention, and was done without voluntary consent and absent any other circumstance that would have authorized law enforcement officers to conduct said search without a warrant.
2. To suppress any statements made by the Defendant to law enforcement officers while in custody for the reason that the statements were made without the Defendant being properly advised of her rights, were the product of an arrest that was unlawful for the reason that said arrest was based upon the improper seizure of evidence by law enforcement officers as set forth in Paragraph 1, and were not voluntarily made.

The Defendant requests an evidentiary hearing in this matter.

The Defendant has separately submitted a brief in support of this motion.

ALONDRA M. REBOLLEDO,
Defendant

s/James J. Regan
James J. Regan #15743
6035 Binney Street
Omaha, NE 68104
(402) 341-2020
Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on May 15, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to Douglas J. Amen, Assistant United States Attorney.

s/James J. Regan
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